

**Commonwealth of Kentucky**  
**Division for Air Quality**  
**PERMIT STATEMENT OF BASIS**

Title V Draft Permit, No. V-02-033

**Griffin Industries, Inc.**

**Henderson Plant**

Butler, Kentucky 42276

July 10, 2002

Matt King

Plant I.D. # 21-191-00007

Application Log # 50291

**SOURCE DESCRIPTION:**

Griffin Industries operates a rendering facility as well as a bakery scrap operation. In the rendering facility animal by-product materials are processed into tallow, grease, and high protein meat and bone meal. The bakery scrap operation dries scrap breads and dough. This dried dough is sized to form cookie meal. A sourcewide sulfur dioxide emission limit of 225 tons per year has been set in order to preclude PSD regulation.

**COMMENTS:**

- I. Type of control and efficiency  
The rendering process is equipped with venturi scrubber/packed tower scrubber as well as a room air scrubber. Both the coal fired boiler and close-coupled gasification unit use mechanical collectors to control particulate emissions.
- II. Emission factors  
Emission factors were obtained from AP-42.
- III. Applicable regulations  
Regulations 401 KAR 59:015, 40 CFR 279, 40 CFR 761, and 40 CFR 60, Subpart WWW are applicable to both emission points one and two, indirect heat exchangers. Regulation 401 KAR 59:015 is applicable to the coal boiler. The cooling tower is regulated by both 401 KAR 63:010 and 63:020. Regulations 401 KAR 59:010 and 59:020 are applicable to the close-coupled gasification unit. Both the unload and loadout process at the facility are regulated by 401 KAR 63:010.
- IV. Emission and Operating Caps description  
In order to preclude the applicability of Regulation 401 KAR 51:017, the emissions of Sulfur Dioxide shall not exceed 225 tons per year for any consecutive 12 month period. In order to preclude 401 KAR 50:012, the VOC emissions shall not exceed 90 tons per year.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.